

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE RUDI M. BREWSTER)

UNITED STATES OF AMERICA,

CASE NO.:00-6342-CR-ZLOCH

Plaintiff,

vs.

ANDREW N. Warburton,

Defendant,

_____ /

MOTION TO ADVANCE THE SENTENCING DATE

COMES NOW the Defendant Andrew N. Warburton, by and through his undersigned counsel, and moves to Advance the Sentencing in this case, upon grounds as follow:

1. Counsel is scheduled to start a six week trial in San Juan, Puerto Rico on April 24, 2001.
2. This sentencing is scheduled for April 23, 2001 at 11:30 am.
3. Counsel is hoping to travel to San Juan, Puerto Rico on the 23rd of April in order to finalize housing and transportation prior to beginning a six week trial the following day.
4. The PSI completion date is for March 19, 2001 and with objections due on April 2, 2001. This would allow for a sentencing during the week of April 16, 20001 if the Court's schedule can accommodate the same.

WHEREFORE, Defendant respectfully moves the Court to advance the sentencing in this case by one week..

JA
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Respectfully submitted,

HABER & ROTH, PA.
1001 Brickell Bay Drive
Suite 1704
Miami, Florida 33131
305-374-6033

BY: 

Martin L. Roth, Esquire
Fla. Bar No. 265004

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was mailed to Larry Bardfeld, AUSA, 500 E. Broward Blvd., Suite 700, Fort Lauderdale, Florida and Francis Weisberg, US Probation Officer, 299 E. Broward Blvd., Room 409. Fort Lauderdale, Florida 33301 on this 13 day of March, 2001.

BY: 

Martin L. Roth, Esquire
Fla. Bar No. 265004